

U.S. Patent Appln. Serial No. 09/800,997
Amendment and Response to Office Action dated August 11, 2006
February 6, 2007

REMARKS

Claims 1, 2, 4-19, 21-28 and 66 are pending in this application. Claims 1, 17, 18, 28 and 66 have been amended. No new matter has been added by way of amendment. Support for the amendments to claims 1, 17, 18, 28 and 66 can be found at least in the Specification as originally filed at p. 7, lines 11-19.

Claims 1, 17, 18, 28 and 66 have been rejected under 35 U.S.C. § 112, second paragraph as allegedly failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. See Office Action at ¶ 11. Claims 1, 2, 10-11, 15-16, 18-19, 25, 27 and 66 are rejected under 35 U.S.C. § 102(a) as allegedly anticipated by European Patent Application No EP 1-014-318 A2 to Yamaguchi ("Yamaguchi"). See Office Action at ¶ 13. Claims 4-9, 12-13, 17, 21-24, 26 and 28 are rejected under 35 U.S.C. § 103(a) as allegedly obvious over Yamaguchi in view of U.S. Patent No. 6,390,362 to Martin ("Martin"). See Office Action at ¶ 22. Claim 14 is rejected under 35 U.S.C. § 103(a) as allegedly obvious over Yamaguchi in view of U.S. Patent No. 5,432,506 to Chapman ("Chapman"). See Office Action at ¶ 30. Applicants respond as follows.

I. Interview on January 3, 2007.

Applicants thank the Examiner for the Interview held on January 3, 2007, although no agreement was reached on allowable subject matter.

II Claim Rejections Under 35 U.S.C. § 102(a).

The rejection of claims 1-2, 10-11, 15-16, 18-19, 25, 27 and 66 under 35 U.S.C. § 102(a) in the Final Rejection dated March 10, 2006 ("Final Rejection") has not been maintained. Applicants thank the Examiner for withdrawing this rejection.

III. Claim Rejections Under 35 U.S.C. § 112.

Claims 1, 17, 18, 28 and 66 have been rejected under 35 U.S.C. § 112, second paragraph as allegedly failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. See Office Action at ¶ 11. The Examiner states that "it is not clear . . . that the word *visible* as used in the claims, is literally the word *visible* meaning 'capable of being seen to the naked human eye,' or 'situated in the region of the electromagnetic spectrum perceptible to human vision.'" *Id.* Applicants have amended the claims to contain the

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imitation "the first security image, when printed on the instrument, is readable in the composite image that is printed on the instrument and is not readable on a photocopy of the instrument." Applicants submit that the term "readable" means "able to be sensed," and encompasses both visibility to humans as well as readable by machine. Applicants request that this rejection be withdrawn.

IV. Claim Rejections Under 35 U.S.C. § 103(a).

Claims 1, 2, 10-11, 15-16, 18-19, 25, 27 and 66 are rejected under 35 U.S.C. § 103(a) as allegedly "anticipated" by Yamaguchi. See Office Action at ¶ 13. Claims 4-9, 12-13, 17, 21-24, 26 and 28 are rejected under 35 U.S.C. § 103(a) as allegedly obvious over Yamaguchi in view of Martin. See Office Action at ¶ 22. Claim 14 is rejected under 35 U.S.C. § 103(a) as allegedly obvious over Yamaguchi in view of Chapman. See Office Action at ¶ 29.

Applicants respectfully submit that the cited references do not disclose each and every element of the rejected claims and therefore do not support a *prima facie* case of obviousness of these claims. Accordingly, these rejections should be withdrawn.

A. Claims 1, 18 and 66.

The Examiner states that Yamaguchi discloses a "system, its method and electronically readable medium for remotely generating an instrument comprising: a) a processor that receives from a customer a request for the instrument (See Yamaguchi abstract, figures 2 step S8 and paragraph [0010] and [0023]); b) generates the instrument in electronic form (See Yamaguchi abstract, figures 2 step S11, and paragraph [0010]-[0013] and [0025]); c) adds a first security image in electronic form to the electronic form of the instrument to create a composite image (See Yamaguchi abstract, figures 2 step S12, and paragraph [0010]-[0013] and [0025]); and d) a communications module that transmits the composite image in electronic form to the customer for printing by the customer to create the instrument (See Yamaguchi abstract, figures 2 step 12, and paragraph [0010]-[0013] and [0025]-[0026], where transmits corresponds to sent). Wherein the first security image, when printed on the instrument, is visible in the composite image that is printed on the instrument and invisible on a photocopy of the instrument (See Yamaguchi figures 2-5, 9, 22, and 23 and related text, paragraphs [0034]-[0036] and [0087])." See Office Action at ¶ 14. (emphasis in original).

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Applicants provided a detailed discussion of the Yamaguchi disclosure in the Amendment and Response filed on December 20, 2005 and incorporate that discussion herein by reference. The pertinent part of that discussion is that Yamaguchi does not teach a "first security image" that is transmitted to a customer as part of a composite image for printing by the customer on a medium, where the "first security image", when printed on the instrument, is "visible in the composite image that is printed on the instrument and invisible on a photocopy of the instrument." Applicants have amended claims 1, 18 and 66 to read that the "first security image" is readable in the composite image that is printed on the instrument and is not readable on a photocopy of the instrument. None of the data items disclosed in Yamaguchi - "security data," "ticket image data" or "ticket printing data" - meets these limitations of the "first security image" of claim 1, 18 and 66 as amended, however.

1. The "security data" of Yamaguchi are readable after photocopying and thus do not meet the limitations of a "first security image" of amended claims 1, 18 and 66.

In Yamaguchi, "security data" is made from ticket issue request data and user identification data that has been sent from a user via a communications means; "ticket image data"¹ is made from the ticket issue request data; and "ticket printing data" is made by embedding the "security data" in the "ticket image data." See Yamaguchi, [0010]-[0013]; [0023]-[0025]; [0029]; [0034]-[0036]; claims 1, 15, 16; Figs. 5, 22, 23. According to Yamaguchi, the "security data" are embedded in the "ticket image data" to form a composite image - the "ticket printing data". See Yamaguchi, [0010]; [0012]; [0013]; [0025]; [0034]-[0036]; [0050]; [0062]; [0085]. The "security data" thus corresponds to the "first security image" of claims 1, 18 and 66 in that it is the only data disclosed in Yamaguchi that is added to the electronic form of the image of the instrument itself to form a composite image. The "ticket image data" corresponds to the "electronic form of the instrument";² and the "ticket printing

¹ The "ticket image data" are the data of "the so-called ticket itself." See Yamaguchi, [0050]; see also Fig. 3.

² See fn 1 *supra*.

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data corresponds to the **"composite image"** that is sent to the user for printing on a medium.

The **"security data"** are invisible to humans against the **"ticket image data"** when the **"ticket printing data"** are printed on a ticket paper. See Yamaguchi, [0010]; [0012]; [0013]; [0025]; [0034]-[0036]; [0050]; [0062]; [0085]; [0087]-[0091]. The **"security data"** 22 of Fig. 2 include a logo mark **"JAPAN"** and also two-dimensional code data. See [0087]. The **"ticket printing data"** 23 is transmitted to a user, who prints a ticket 14. See [0089]. The image of the **"ticket printing data"** (which is made by a composition of **"ticket image data"** 21 and **"security data"** 22) is seen by humans as a landscape photograph, while the security data 22 are invisibly embedded. See [0088]; element 23 of Fig. 22. Thus, the **"security data"** are not visible to humans. The **"security data"** can be detected by machine, however, using key image data. See [0073]; [0087]; [0090]; Fig. 22. Thus, the **"security data"** of Yamaguchi are **"readable"** when printed as part of a composite image on a medium.

However, Yamaguchi further discloses that **"security data"** are *also* readable by machine in a photocopy of the ticket 14. See [0082] (*"As described above, by detecting the presence of the security data 22 embedded in the used ticket 14, the genuineness of the ticket 14 can be easily judged. For instance, even if the ticket 14 was given to a third person and illegally copied using a color copying machine, the history of that ticket, for instance, when, where and who issued it can be seen as the security data 22 contains a inquiry serial number and an illegal route can be detected easily."*) (emphasis added). Thus, **"security data"** 22 does not meet the **"first security image"** limitations of claims because the **"security data"** of Yamaguchi remain readable by machine even after photocopying the ticket on which they are printed. In contrast, amended claims 1, 18 and 66 include the limitation that the **"first security image"** is *not* readable after photocopying.

2. Neither the **"ticket image data"** nor the **"ticket printing data"** meet the limitations of a **"first security image"** as claimed in amended claims 1, 18 and 66.

Neither the **"ticket image data"** nor the **"ticket printing data"** meet the limitations of a **"first security image"** of amended claims 1, 18 and 66, either. The **"ticket image data"** is *"the so-called ticket itself"* (see [0050]), and is visible by humans when the ticket is copied. See Yamaguchi, [0029]; Figs. 3, 5. Similarly, the **"ticket printing data"** is a composite of the

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"security data" and the "ticket image data," and is likewise visible to humans when the ticket is copied. These data of Yamaguchi thus do not satisfy the requirements of the "first security image" of amended claims 1, 18 and 66, either.

3. **Yamaguchi does not support a *prima facie* case of obviousness of claims 1, 18 and 66.**

Yamaguchi does not support a *prima facie* case of obviousness of claim 1, 18 and 66 because it does not disclose each and every limitation of these claims. As discussed *supra*, Yamaguchi does not disclose a "first security image" that is readable (whether visible by humans or machine readable) when printed as part of a composite image on a medium, but is *not* readable (whether by humans or by machine) upon photocopying.

In fact, Yamaguchi teaches away from using a "first security image" as claimed in amended claims 1, 18 and 66. The invention of Yamaguchi is intended to detect genuineness of tickets issued through the inventive system by way of the use of security data, for example when tickets are illegally copied. See [0002] ("Further the present invention relates to a ticket collating method for examining the genuineness of issued tickets."); [0082] (genuineness of ticket 14 can be judged even if ticket is illegally copied because embedded security data 22 contains an inquiry serial number such that the history of that ticket can be checked). Yamaguchi makes clear that the "security data" must be readable by machine after photocopying in order to determine an "illegal route" when a ticket has been "illegally copied." Applicants therefore dispute the conclusion that "it would have been a clear obvious modification to Yamaguchi teaching for furthering the security of the printed instrument remotely for such instrument to use fragile watermarks." Office Action at ¶ 15.

Accordingly, the use of fragile watermarks as "security data" that were *not* readable after photocopying would render the proposed modification of Yamaguchi unsatisfactory for its intended purpose. See MPEP § 2143.01(V), citing *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984) (Board concluded claims were *prima facie* obvious in that reference device (a liquid strainer) could be turned upside down; court reversed because if prior art device were turned upside down, it would be inoperable for its intended purpose). The invention of Yamaguchi of using "security data" to detect illegal copies of tickets would be inoperable if

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"security data" were not readable by humans or machines after photocopying because illegal copying could not then be detected. Claims 1, 18 and 66 therefore are not obvious in view of Yamaguchi and Applicants respectfully submit that these rejections should be withdrawn.

B. Yamaguchi does not support a *prima facie* case of obviousness of claims 2, 10, 11, 15, 16, 19, 25 and 27.

For the reasons stated *supra*, Applicants respectfully submit that Yamaguchi cannot support a *prima facie* case of obviousness of claims 2, 10, 11, 15, 16, 19, 25 or 27, which are dependent on claims 1, 18 and 66. See Office Action at ¶¶ 16-21. Accordingly, Applicants request that these rejections be withdrawn.

C. Claims 4-9, 12-13, 17, 21-24, 26 and 28.

Claims 4-9, 12-13, 17, 21-24, 26 and 28 are rejected under 35 U.S.C. § 103(a) as allegedly obvious over Yamaguchi in view of Martin. See Office Action at ¶ 22. Applicants respectfully submit that Yamaguchi in combination with Martin does not disclose each and every limitation of claims 4-9, 12-13, 17, 21-24, 26 and 28, and that this rejection be withdrawn for failing to form a *prima facie* case of obviousness.

1. Claims 4-9, 12-13, 21-24 and 26.

The Examiner states that Yamaguchi in view of Martin discloses all the limitations of claims 4-9 and 12-13. See Office Action at ¶¶ 23-27. Applicants respectfully submit that, as discussed in Sec. IV(A)(1) *supra*, Yamaguchi does not disclose at least the limitation of claims 1 and 18 of a system or its method of transmitting to a customer an instrument remotely generated in electronic form to which a "first security image" in electronic form has been added to form a composite image for printing by the customer on a medium, wherein the "first security image" is readable in the composite image that is printed on the instrument and is not readable on a photocopy of the instrument. Rather, Yamaguchi discloses "security data" that are invisible to humans but machine readable in the composite image that is printed on ticket paper by a user, and that are *also* machine readable when copied. See Yamaguchi, [0010], line 44-45; [0012], lines 57-58; [0013], lines 6-7; [0034], lines 7-8; [0050], lines 57-58; [0062], lines 48-49; [0088], lines 31-32; [0091], lines 41-42; [0092], lines 44-45; claims 1, 15, 16; Figs. 5, 22, 23.

Yamaguchi also discloses "ticket printing data" comprising "security data" and "ticket image

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data" that are visible to humans in a composite image when printed on ticket paper by a user, and are also visible to humans in a photocopy of the instrument. See Sec. IV(A)(2).

Martin does not disclose the limitations that are missing in Yamaguchi. Martin discloses an inventive check that includes a barcode, which includes at least one of the following pieces of information: the date the check was paid, the amount of the check, the payee, the drawers account number, the bank's routing number, and the identifier number of the check. See Martin, Abstract; col. 4, lines 5-19; col. 5, lines 7-14; col. 7, lines 38-42. Martin also provides for a method for preventing check fraud which includes attaching a machine readable code on a negotiable instrument and creating a negotiable instrument, where the drawee receives the negotiable instrument and scans the machine readable bar code. See Martin, Abstract. However, Martin does not disclose at least the limitation of claims 1 and 18 of a system or its method of transmitting to a customer an instrument remotely generated in electronic form to which a first security image in electronic form has been added to form a composite image for printing by the customer on a medium, wherein the first security image is readable in the composite image that is printed on the instrument and not readable on a photocopy of the instrument.

Since claims 4-9 and 12-13 depend from claim 1 and claims 21-24 and 26 depend from claim 18, Yamaguchi in combination with Martin does not disclose each and every limitation of these claims, and specifically does not disclose the limitation of the first security image is readable in the composite image that is printed on the instrument and not readable on a photocopy of the instrument. Therefore, Applicants respectfully request that the rejections of claims 4-9, 12-13, 21-24 and 26 be withdrawn for failure to form a *prima facie* case of obviousness.

2. Claims 17 and 28.

The Examiner states that as per claims 17 and 28, Yamaguchi "is not explicit [that] the composite image is for printing on a medium having a second security image the second security image is invisible on the instrument and is visible on a photocopy of the instrument." See Office Action at ¶ 28. According to the Examiner, "Martin clearly discloses the presence of secondary security image on the instrument visible only when the instrument has been copied (See Martin, column 2, lines 11-15 and 21-24 and column 4, lines 21-39)." *Id.* According to the Examiner,

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"It would have been obvious to one having ordinary skill in the art at the time the current invention was made to further include additional security images such as pantographs spelling out certain words or images (Void or Copy, etc.) for the motivation of better security and fraud prevention." *Id.*

The Examiner further states that Yamaguchi is "not explicit and specific [that] the instrument is generated by an issuing financial institution, the funds are certified by the issuing financial institution and the customer holds a deposit account with the issuing financial institution." *Id.* According to the Examiner, Martin "clearly discloses that a financial entity such as a bank is the generator of the instrument and the bank is grantor of the payment of the face amount to the payee from the payor's account held at the bank (See Martin abstract, column 3, line 55-column 4, line 2 and column 8, lines 10-19)." *Id.* According to the Examiner, "it would have been obvious to one having ordinary skill in the art at the time the current invention was made to have the financial institution certify the financial instrument created and drawn on an account of an account holder and printed for the motivation of further security of the financial or negotiable instrument and presence of the funds to cover such instrument." *Id.*

Applicants respectfully submit that, as discussed in Sec. IV(A)(1) *supra*, Yamaguchi does not disclose at least the limitation of claims 1 and 18 of a system or its method of transmitting to a customer an instrument remotely generated in electronic form to which a "first security image" in electronic form has been added to form a composite image for printing by the customer on a medium, wherein the "first security image" is readable in the composite image that is printed on the instrument and is not readable on a photocopy of the instrument. Rather, Yamaguchi discloses "security data" that are invisible to humans but machine readable in the composite image that is printed on ticket paper by a user, and that are *also* machine readable when copied. See Yamaguchi, [0010], line 44-45; [0012], lines 57-58; [0013], lines 6-7; [0034], lines 7-8; [0050], lines 57-58; [0062], lines 48-49; [0088], lines 31-32; [0091], lines 41-42; [0092], lines 41-45; claims 1, 15, 16; Figs. 5, 22, 23. Yamaguchi also discloses "ticket printing data" comprising "security data" and "ticket image data" that are visible to humans in a composite image when printed on ticket paper by a user, and are also visible to humans in a photocopy of the instrument. See Sec. IV(A)(2).

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Martin does not disclose the limitation of claims 17 and 28 of a system or its method of transmitting to a customer an instrument remotely generated in electronic form to which a first security image in electronic form has been added to form a composite image for printing by the customer on a medium, wherein the first security image is readable in the composite image that is printed on the instrument and not readable on a photocopy of the instrument. Therefore, Applicants respectfully request that this rejection be withdrawn against claims 17 and 28 for failure to form a *prima facie* case of obviousness.

D. Claim 14.

Claim 14 has been rejected under 35 U.S.C. § 103(a) as allegedly obvious over Yamaguchi in view of Chapman. See Office Action at ¶ 29. Applicants respectfully submit that Yamaguchi in combination with Chapman does not disclose each and every limitation of claim 14 and that this rejection be withdrawn for failing to form a *prima facie* case of obviousness.

The Examiner states that Yamaguchi discloses all the limitations of claim 10, and that Chapman "clearly discloses that the . . . instrument can be checks, money orders, stock certificates, passports, other financial instruments, or other documents subject to counterfeiting and forgery (See Chapman abstract, column 1, lines 53-68, and column 4, lines 64-68)." See Office Action at ¶ 30. According to the Examiner, "it would have been obvious to one having ordinary skill in the art at the time the current invention was made to include other financial instruments as well as other documents subject to counterfeiting and forgery such as bonds and stock certificates for the motivation of further broadening of the usefulness of the Yamaguchi's invention." *Id.*

As discussed in Sec. IV(A)(1), *supra*, Applicants respectfully submit that Yamaguchi does not disclose at least the limitation of claim 1 of a system or its method of transmitting to a customer an instrument remotely generated in electronic form to which a "first security image" in electronic form has been added to form a composite image for printing by the customer on a medium, wherein the "first security image" is readable in the composite image that is printed on the instrument and is not readable on a photocopy of the instrument. Rather, Yamaguchi discloses "security data" that are invisible to humans but machine readable in the composite image that is printed on ticket paper by a user, and that are *also* machine readable when copied.

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See Yamaguchi, [0010], line 44-45; [0012], lines 57-58; [0013], lines 6-7; [0034], lines 7-8; [0050], lines 57-58; [0062], lines 48-49; [0088], lines 31-32; [0091], lines 41-42; [0092], lines 44-45; claims 1, 15, 16; Figs. 5, 22, 23. Yamaguchi also discloses "ticket printing data" comprising "security data" and "ticket image data" that are visible to humans in a composite image when printed on ticket paper by a user, and are also visible to humans in a photocopy of the instrument. See Sec. II(A)(2).

Chapman discloses a system for verifying the authenticity of a document that bears a number of fields of strings of variable characters such as a check bearing date of issue field, payee field and numeric and alpha amount fields. See Chapman, Abstract; col. 2, lines 54-68. The system of Chapman authenticates a document by entry of certain elements written or printed on an instrument into a computer, with the computer generating a code that it compares with a unique code on the instrument. See col. 1, lines 53-60. A mismatch between the generated code and the unique code on the instrument indicates fraud. See col. 1, lines 60-61. However, Chapman does not disclose at least the limitation of claim 1 of a system or its method of transmitting to a customer an instrument remotely generated in electronic form to which a first security image in electronic form has been added to form a composite image for printing by the customer on a medium, wherein the first security image is readable in the composite image that is printed on the instrument and not readable on a photocopy of the instrument.

Applicants respectfully submit that Yamaguchi in combination with Chapman does not disclose each and every limitation of claim 14 (which depends from claim 1), and specifically does not disclose the limitation that the first security image is readable in the composite image that is printed on the instrument and is not readable on a photocopy of the instrument. Therefore, applicants respectfully request that this rejection be withdrawn against claim 14 for failure to form a *prima facie* case of obviousness.

IV. Response to Examiner's arguments.

The Examiner states that "the Yamaguchi reference clearly teaches a visible image is used for over lay that is visible on the instrument as printed as well as the instrument has invisible data hidden within barcodes as well as the visible watermark printed on the instrument." See Office Action at ¶ 4. The Examiner cites to Yamaguchi at Figs. 2-5, 9, 22 and

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25; [0087]; and [0034]-[0036] as allegedly teaching the printing of visible and invisible image data to be printed on a medium. *See id.* The Examiner also states that "the logo mark is used as a visible as well as invisible state as to be used as a security image." *See* Office Action at ¶ 4. The Examiner yet further states that, "[t]he thrust of the applicant's argument is that the first security image is visible on the instrument printed on the medium." *Id.*

Applicants disagree that with the Examiner that this is the "thrust" of their argument. Rather, the thrust of the argument is that Yamaguchi does not disclose any *single data* item that is *readable* when printed on a medium, where that *same data* is then *not readable* when copied. At most, Yamaguchi discloses certain data (e.g., "ticket printing data") that are visible to humans (and thus readable) when printed on a medium, and also discloses "security data" that are not visible to humans either when printed on a medium or when copied but are machine readable after being copied. Applicants, however, have claimed a system and method of automatically generating an instrument comprising a "first security image", where the "*first security image*" is *readable* when printed on a medium, *and* the "*first security image*" - the *same data* item - is *not readable* when copied. As discussed in Sec. IV(A)(1) and (2), there is no *single* item of data in Yamaguchi that satisfies this claim limitation of being both readable when printed, and not readable when copied.

The Examiner further states that Yamaguchi discloses that "[w]hen security data is printed on a paper, the security data is visible" and then concludes that "[a]nd when it is copied the watermark does not copy thereafter . . . [t]his method of electronically or digitally embedding a watermark in an image for either printing or display is known in the art which such watermark can be perceivable to human eye as well as machines or both and once such image is printed the embedded information as watermark is present in the image and will not be perceivable by human eye or machine once it has been copied by a copy machine . . . [a]s it has been admittedly been presented in the specifications as mentioned above and supported by the applicant in submitted document exhibits A and B . . ." Office Action at ¶ 7. Applicants reply that apparently the Examiner equates the "security data" of Yamaguchi with a watermark. *See, e.g.,* Office Action dated November 19, 2004, ¶ 7. However, even a watermark as described by the Examiner is *not* disclosed by the "security data" of Yamaguchi because the "security data"

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are (and must be) readable after photocopying. See [0082] ("As described above, by detecting the presence of the security data 22 embedded in the used ticket 14, the genuineness of the ticket 14 can be easily judged. *For instance, even if the ticket 14 was given to a third person and illegally copied using a color copying machine, the history of that ticket, for instance, when, where and who issued it can be seen as the security data 22 contains a inquiry serial number and an illegal route can be detected easily.*") (emphasis added). Thus, "security data" 22 does not meet the "first security image" limitation of amended claims 1, 18 and 66 because they are not readable by machine after being photocopied.

The Examiner further states that paper watermarks that are visible by "holding the instrument against the light, can be considered as visible image and once the instrument has been copied the paper watermark does not copy or printing holograms that are difficult to copy (See Martin '362 column 2, lines 11-46)." See Office Action at ¶ 8. Applicants respectfully submit that the paper watermarks disclosed in Martin are *not* "a first security image" that is added in electronic form to create a composite image and that is printed on the instrument, as required by claims 1, 18 and 66. Rather, Martin discloses watermarks that are made by applying different degrees of pressure during the paper manufacturing process. See col. 2, lines 16-18. Therefore, the paper watermark does not meet the requirements of these claims of a "first security image." Further, as discussed *supra* in Sec. IV(A)(3), the use of fragile watermarks as "security data" would render the invention of Yamaguchi unsatisfactory for its intended purpose and thus even in combination with Yamaguchi cannot support a *prima facie* case of obviousness.

There is no item of data in Yamaguchi that meets the limitations of a "first security image" as claimed in amended claims 1, 17, 18, 28 and 66. Since neither Yamaguchi, alone or in combination with Martin and/or Chapman, discloses each and every limitation of claims 1, 17, 18, 28 and 66, and specifically does not disclose the limitation of a "first security image" that is readable in the composite image that is printed on the instrument and that is not readable on a photocopy of the instrument, Applicants respectfully request that the rejections for alleged obviousness should be withdrawn.

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CONCLUSION

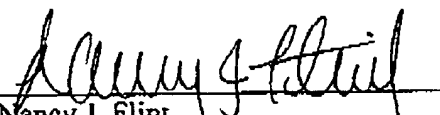
Applicants respectfully request that this all pending claims 1, 2, 4-19, 21-28 and 66 are in condition for allowance. This response has been filed within six (6) months of the mailing date of the Office Action and the Commissioner is hereby authorized to deduct a fee of \$1020.00 from the undersigned's Deposit Account No. 50-0206 for a three month extension of time. If any variance from this amount is determined, the Commissioner is hereby authorized to charge or credit that variance to the undersigned's Deposit Account No. 50-0206.

Respectfully submitted,

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